

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

TRANSCARE CORPORATION, *et al.*,

Debtors,

SHAMEEKA IEN on behalf of herself and all others  
similarly situated,

Plaintiff,

v.

TRANSCARE CORPORATION, TRANSCARE  
NEW YORK, INC., TRANSCARE ML, INC., TC  
AMBULANCE GROUP, INC., TRANSCARE  
MANAGEMENT SERVICES, INC., TCBA  
AMBULANCE, INC., TC BILLING AND  
SERVICES CORPORATION, TRANSCARE  
WESTCHESTER, INC., TRANSCARE  
MARYLAND, INC., TC AMBULANCE NORTH,  
INC., AND TRANSCARE HARTFORD COUNTY,  
INC., LYNN TILTON, ARK CLO 2001-1 LIMITED,  
ARK INVESTMENT PARTNERS II, L.P.,  
PATRIARCH PARTNERS, LLC, AND  
PATRIARCH PARTNERS III, LLC,

Defendants.

Bankr. Case. No. 16-10407-SMB  
Chapter 7  
(Jointly Administered)

Adversary Proceeding No. 16-cv- 01033-SMB

**STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER, MOVE OR  
OTHERWISE RESPOND TO THE  
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties that the time within which Defendants Lynn Tilton, Patriarch Partners, LLC, Patriarch Partners III, LLC, Ark Clo 2001-1 Limited, and Ark Investment Partners II, L.P. (collectively, "Defendants") may move, answer, or otherwise respond to the Complaint is hereby extended from April 4, 2016, to and including April 22, 2016 for Defendants to sufficiently

review the Complaint and file their response. There has been no previous request for extension of time in connection with this matter. Facsimile or electronic signatures on this Stipulation are hereby deemed originals. No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants, hereby expressly reserve, any and all defenses.

Dated: New York, New York  
April 4, 2016

By: /s/ Jack A. Raisner

Jack A. Raisner  
René S. Roupinian  
OUTTEN & GOLDEN, LLP  
3 Park Avenue, 29<sup>th</sup> Floor  
New York, NY 10016  
(212) 245-1000  
jar@outtengolden.com  
rsr@outtengolden.com  
*Attorneys for Plaintiff*

By: /s/Kathleen M. McKenna

Kathleen M. McKenna  
Allan S. Bloom  
PROSKAUER ROSE LLP  
Eleven Times Square  
New York, New York 10036  
(212) 969-3000  
kmckenna@proskauer.com  
abloom@proskauer.com  
*Attorneys for Defendants  
Lynn Tilton, Patriarch Partners  
LLC, Patriarch Partners III, LLC,  
Ark Clo 2001-1 Limited, and Ark  
Investment Partners II, L.P.*

SO ORDERED this 5<sup>th</sup> day of April 2016

/s/ STUART M. BERNSTEIN  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE